UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER DISASTER SITE LITIGATION

MASTER DOCKET: 21 MC 100 (AKH)

ROBERT SCHOR

CIVIL ACTION NO: 05-CV-1618

-against-

A. RUSSO WRECKING, ET AL,

DEFENDANTS.

PLAINTIFF,

NOTICE OF MOTION TO SUBSTITUTE PLAINTIFF

PLEASE TAKE NOTICE that on a day to be determined by this Court, Worby Groner Edelman & Napoli Bern, LLP, counsel for the deceased plaintiff Robert Schor, shall apply to the Honorable Alvin K. Hellerstein, U.S.D.J. at the Southern District of New York located at 500 Pear Street, New York, New York, Room 14-D for an Order substituting Michelle Schor, Administratrix of the Estate of Robert Schor, as the Plaintiff in this case

PLEASE TAKE FURTHER NOTICE that Worby Groner Edelman & Napoli Bern, LLP counsel for the plaintiff decedent Robert Schor, shall move this Court for any additional appropriate relief this Court deems just and proper.

Dated: January 20, 2011

Christopher R. LoPalo (CL-6466)

Worby Groner Edelman & Napoli Bern, LLP

350 Fifth Avenue, Suite 7413

Judge wrote:

"Motion granted. The caption is re-styled to show the substitution, and the case, as re-styled, shall be added to the opt-out cases, to be included in the Feb. 2, 2011 status conference.

1/24/11 Alvin K. Hellerstein"